



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
230 SOUTH DEARBORN ST.  
CHICAGO, ILLINOIS 60604

EPA Region 5 Records Ctr.



248005

REPLY TO ATTENTION OF:

SHS-12

**MEMORANDUM**

DATE: SEP 24 1991

SUBJECT: ACTION MEMORANDUM Request for a Removal Action at the Driscoll and Company, Inc. Site, Chicago, Cook County, Illinois

Site ID#: NP

Category of Removal: Time Critical

Nationally Significant: No

FROM: Steven J. Faryan, On-Scene Coordinator

TO: David A. Ullrich, Director  
Waste Management Division

THRU: Norm Niedergang, Associate Division Director  
Office of Superfund

I. PURPOSE

The purpose of this Action Memo is to confirm the verbal authorization for \$ 50,000 given by Robert J. Bowden, Chief of the Emergency and Enforcement Response Branch, on August 20, 1991 and to confirm the verbal increase to \$ 100,000 given by Jodi Traub, Acting Director, Office of Superfund, on September 9, 1991. This Action Memorandum requests a total project ceiling of \$ 1,450,000 to complete the time critical removal action described herein for the Driscoll and Company, Inc. (D&C) site, 3145 West Grand Avenue, Chicago, Cook County, Illinois. The \$ 1,450,000 ceiling includes the \$ 100,000 verbal authorizations referred to above. The objective of the proposed removal action is to mitigate the threat of public exposure and the release of hazardous substances through containing, securing, neutralizing, and disposing of 50,000 gallons of cyanide plating liquids, 100 55-gallon drums of unknown plating liquids, 200 lab chemicals, and an estimated 2,000 linear feet of loose asbestos.

## II. SITE CONDITIONS AND BACKGROUND

The D&C site is an abandoned electroplating facility located at 3145 West Grand Avenue, Chicago, Illinois. The site covers approximately 1.5 acres and consists of two buildings which are separated by an alley. The site is bordered by Kedzie Avenue to the west, West Grand Avenue to the north, Troy Avenue to the east, and a commercial building to the south. Land use surrounding the site is primarily commercial and residential.

The time period during which electroplating operations occurred at the site is unknown at this time. The site was initially investigated by the Chicago Department of Consumer Services (DOCS) in October, 1989 as the result of a citizen complaint. A follow-up inspection was conducted by the DOCS and the Metropolitan Water Reclamation District (MWRD) in August 1990. Samples collected from tanks on-site revealed the presence of cyanide in concentrations of 3,000-3,500 parts per million (ppm) and copper in concentrations of 20-25 ppm. The DOCS and MWRD requested that U.S. EPA conduct a site assessment for a potential immediate removal action since drums and vats remained on site in deteriorating condition and vandalism was apparent at the facility.

On August 15, 1991, a site inspection was conducted by U.S. EPA On-Scene Coordinator Steven J. Faryan, DOCS personnel, and the Technical Assistance Team (TAT). Inspection of the site's southern building revealed the presence of a deteriorating plating line containing a dark green liquid. The volume of the vat containing the liquid was estimated to be approximately 10,500 gallons. A hazcat test run on the liquid indicated chromium concentrations in the range of 3,000-4,000 ppm. Two large tanks were also discovered, one of which contained approximately 3,100 gallons of green-colored sludge. Approximately 150 plastic and metal drums were also discovered in the southern building. Some of the drums were unlabelled; while labelled drums included "Super Max" and hypochlorite, caustic, and nickel solutions. One open poly drum was observed to contain several laboratory sized bottles of chemicals, including EDTA, hydrochloric acid, bromine water, monochromic acid, nickel sulfite, and barium chloride.

The alley between the northern and southern buildings contained approximately 8 drums stacked along the walls. The soil in the alley appeared to have been stained with oil.

Several empty drums and approximately forty (40) drums with unknown contents were also found in the open courtyard of the northern building. Approximately 10 drums were observed inside the site's northern building. Labels on the drums included sulfuric acid, hydrogen peroxide, sodium cyanide, and hydraulic oil. A plating line with three compartments was observed inside the northern building. Two of the compartments were full and labelled "Hazardous Liquid - Chromate Solution". The last compartment

contained an unknown liquid that could not be accessed. One additional horse shoe shaped vat was observed which contained a clear brown liquid. A total of approximately 20,000 gallons of liquid wastes were estimated to be present in the northern building.

During the inspection, four samples were collected from vats, four samples were collected from drums, and two soil samples were collected from the alley. Analysis of the samples revealed cyanide concentrations up to 9,700 ppm, chromium concentrations up to 10,200 ppm, nickel concentrations up to 457,000 ppm and zinc concentrations up to 978 ppm.

The U.S. EPA Emergency Response Branch mobilized the Emergency Response Clean-Up Services (ERCS) contractor OHM Corp. to the site on September 3, 1991 to mitigate the immediate threats posed by deteriorating conditions at the Driscoll site. The ERCS contractor was utilized to stabilize the site by overpacking, staging, and sampling of all drums, tanks, vats, pits, and lab chemicals which were left abandoned on site. These stabilization operations were completed on September 18, 1991, and 24 hour security will continue until disposal operations begin.

On August 9, 1991, Judge Foreman of the Circuit Court of Cook County, Illinois found that an imminent threat to public health and safety exist at the Driscoll site due to the unsecured and deteriorating conditions at the site and the presence of hazardous materials at the site. Judge Foreman issued a temporary restraining order and preliminary injunction authorizing the City of Chicago to take the steps necessary to prevent the release of these hazardous material and limiting site access to U.S EPA and the City of Chicago. On August 21, 1991 the City requested U.S. EPA's assistance in stabilizing the site.

The D&C site has not been proposed for the NPL and it has not received a Hazard Ranking System (HRS) score. The data from the site will be forwarded to the Agency for Toxic Substances and Disease Registry (ATSDR) for evaluation of public health risk. The site is not being referred to the Site Assessment Program. Mr. James O'Brien of the Illinois Environmental Protection Agency (IEPA) has been notified of the impending removal action at the D&C site.

### III. THREATS TO PUBLIC HEALTH OR WELFARE OR THE ENVIRONMENT, AND STATUTORY AND REGULATORY AUTHORITIES

Conditions presently exist at the D & C site that if not addressed by implementing the response action documented in this Action Memorandum may present a possible imminent threat and substantial endangerment to the public health, welfare, or the environment. The conditions at the D&C site meet the criteria set forth in

- o Actual or potential exposure to nearby human populations, animals, or the food chain from hazardous substances or pollutants or contaminants.

Analytical results of the samples collected from vats and drums on-site have revealed the presence of hazardous substances, including chromium, cyanide, zinc and nickel which pose potential inhalation, ingestion, and direct contact hazards. The site is located across the street from a residential area, and even though gates to the building are locked the site can still be accessed from the alley, increasing the threat of human exposure. Vandalism is apparent at the facility with broken windows, doors ajar, and access through the roof and holes in the building walls.

- o Hazardous substances or pollutants or contaminants in drums, barrels, tanks, or other bulk storage containers, that may pose a threat of release.

Inspections have revealed several hazardous substances, including chromium, cyanide, caustics, hydrogen peroxide, and sulfuric acid that are stored in vats and drums that are deteriorating and may pose a threat of release. Drums of sulfuric acid and vats of cyanide plating liquids were stored next to each other in deteriorating condition creating the potential for a hydrogen cyanide release.

- o Weather conditions that may cause hazardous substances or pollutants or contaminants to migrate or to be released:

In several areas of the two buildings, cracks have formed in the ceilings and rain water has leaked in. During a heavy rainstorm, water could potentially flood the vats and create a potential overflow which would allow hazardous substances to migrate.

#### IV. ENDANGERMENT DETERMINATION

Given the deteriorating site conditions, the nature of the hazardous substances on site, and the potential exposure pathways to nearby populations described in Section II and III above, actual or threatened releases of hazardous substances from this site, if not addressed by implementing the response action selected in this Action Memorandum, may present an imminent and substantial endangerment to public health, or welfare, or the environment.

#### V. PROPOSED ACTIONS AND ESTIMATED COSTS

The preferred removal action to mitigate threats associated with the D&C site will consist of on-site or off-site treatment of liquid/sludge wastes, decontamination of on-site vats, tanks, and floors, and landfilling of non-hazardous waste. The removal will require the following tasks:

- o Developing and implementing a site safety plan
- o Securing of the site, overpacking of leaking drums, and segregation of incompatible waste
- o Staging, sampling, and compatibility testing of all liquids, sludges and other hazardous wastes and substances;
- o Bulking of wastes for disposal or on-site treatment;
- o Collection of bulked samples for disposal facility approval;
- o Evaluation of on-site treatment and treatability studies;
- o Decontamination of drums, vats, tanks, floors, and debris;
- o Removal of non-hazardous waste;
- o Disposal of lab pack chemicals;
- o Removal of loose and friable asbestos inside the building;

The removal action will result in the removal and disposal of approximately 40,000 gallons of liquid wastes and sludge from vats, tanks, and drums, and about 100 tons of non-hazardous debris. The non-hazardous debris has to be removed in order to access the drums, tanks and vats.

All applicable, relevant, and appropriate requirements (ARARs) will be complied with to the extent practicable. A letter has been sent to IEPA requesting that it identify State ARARs. Any State ARARs identified in a timely manner for this removal action will be complied with to the extent practicable.

The On-Scene Coordinator has begun planning for provision of post-removal site control, consistent with the provisions of Section 300.415(k) of the NCP.

The response actions described in this memorandum directly address actual or threatened releases of hazardous substances, pollutants or contaminants at the facility which may pose an imminent and substantial endangerment to public health and safety, and to the environment. These response actions do not impose a burden on affected property disproportionate to the extent to which that property contributes to the conditions being addressed.

The detailed Emergency Response Cleanup Services (ERCS) contractor cost breakdown is presented in Attachment 1, and the estimated total removal project ceiling is presented on page 6.

The removal action will take approximately 120 days to complete, of which 60 days will be active on-site working days.

#### ESTIMATED PROJECT COSTS

##### EXTRAMURAL

CLEAN UP CONTRACTOR (ERCS)	\$ 1,000,000
ERCS CONTINGENCY (15%)	\$ 150,000
SUBTOTAL	\$ 1,150,000
TAT, including multiplier	\$ 90,000
EXTRAMURAL SUBTOTAL	\$ 1,240,000
EXTRAMURAL CONTINGENCY (15%)	\$ 160,000
EXTRAMURAL TOTAL	\$ 1,400,000

##### INTRAMURAL

U.S. EPA DIRECT COSTS [\$ 30/HOUR (600 REGIONAL HOURS + 60 HQ hours)	\$ 20,000
U.S. EPA Indirect Costs { \$53/hr x 600 Regional hours }	30,000
Intramural Total	\$ 50,000
TOTAL REMOVAL PROJECT CEILING ESTIMATE	\$ 1,450,000

#### VI. EXPECTED CHANGE IN THE SITUATION SHOULD ACTION BE DELAYED OR NOT TAKEN

In the event the cleanup is delayed or the site is left unattended, the possibility exists for contamination to spread and increase public health risks. Site inspections have documented the presence of hazardous materials at the D&C site. Many of the vats, tanks, and containers which contain hazardous materials are in open or deteriorating condition. The site is across the street from a residential area. There is a continuous possibility of trespassing, arson and vandalism at the site, increasing the chance of a release of hazardous substances which would cause a threat to public health.

VII. OUTSTANDING POLICY ISSUES

None.

VIII. ENFORCEMENT

For administrative purposes, information concerning the enforcement strategy for this site is contained in a Confidential Attachment II.

IX. RECOMMENDATION

This decision document represents the selected removal action for the D&C site in Chicago, Cook County, Illinois, developed in accordance with the Comprehensive Environmental Response Compensation and Liability Act (CERCLA) as amended 42 U.S.C. Section 9601 et. seq., and to extent practicable is not inconsistent with the National Contingency Plan (NCP). This decision is based on the administrative record for the site. (The attached index identifies the items that comprise the Administrative Record upon which the selection of the removal action is based.) (See attachment III)

Conditions at the site meet the NCP section 300.415(b)(2) criteria for a removal and I recommend your approval of the proposed removal action. The total project ceiling if approved will be \$1,450,000. Of this, an estimated \$1,150,000 is for the extramural contractor.

APPROVE:

David A. Ullrich  
DIRECTOR, WASTE MANAGEMENT DIVISION

DATE:

9/24/91

DISAPPROVE:

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DIRECTOR, WASTE MANAGEMENT DIVISION

DATE:

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Attachments:

- I. ERCS contractor cost projection
- II. Enforcement Confidential
- III. Index to the Administrative Record

bcc: T. Johnson, OS-210  
A. Baumann, 5HS-12  
R. Powers/R. Buckley, 5HS-GI  
R. Bowden, 5HS-12  
P. Schafer, 5HS-12  
T. Geishecker, 5HS-12  
T. Gioia, 5HS-12  
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S. Faryan, 5HS-12  
R. Clarizio, ORC, TUB-7  
M. Messersmith, 5HS-12  
State Agency Superfund Coordinator  
EERB Read File (Margie Johnson)  
EERB Delivery Order File (Charles Brasher)  
EERB Site File (Char Gwizdala)



ATTACHMENT I

CLEAN-UP CONTRACTOR COSTS

CONTRACTOR PERSONNEL	\$ 350,000
CONTRACTOR EQUIPMENT	\$ 150,000
UNIT RATE MATERIAL	\$ 8,000
AT COST MATERIALS	\$ 42,000
SUBCONTRACTORS	\$ 50,000
WASTE DISPOSAL AND TRANSPORTATION	\$ 400,000
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CLEAN-UP CONTRACTOR TOTAL	\$ 1,000,000

ATTACHMENT II

ENFORCEMENT CONFIDENTIAL

Redacted-information not relevant to the selection of the removal action.

ATTACHMENT III  
 ADMINISTRATIVE RECORD  
 FOR  
 DRISCOLL & COMPANY  
 September 19, 1991

<u>DATE</u>	<u>AUTHOR</u>	<u>RECIPIENT</u>	<u>TITLE/DESCRIPTION</u>	<u>PAGES</u>
08/09/90	Nagam, R., E & E	Faryan, S., U.S. EPA	Initial Incident Response Data Sheet	1
12/08/90	—	U.S. EPA	Initial Field Assessment Report	2
12/10/90	Ferg, J., TPC	Waclawik, J., MWRD	Telephone Record	1
12/12/90	Gaggiano, R., Metro Water Reclamation District	Ferg, J., City of Chicago	Analytical Data and Sketch	4
00/00/00			Action Memorandum (Pending)	